

EXHIBITS TO PLAINTIFF'S REPLY TO WORTHPOINT'S OPPOSITION TO PLAINTIFF'S MOTION TO RECONSIDER

EXHIBIT # 1 Nov. 23, 2022 Conference Call transcript page 64.

#1 Nov. 23, 2022 Conference Call transcript page 65.

EXHIBIT # 2 Nov. 23, 2022 email to Dr. Joseph Scelsa availability for expert report.

EXHIBIT # 3 Defendants' Nov. 23, 2023 email unknown coding - Source Information.

EXHIBIT # 4 Original Electronic Message Print out Adam Bialek Nov. 23, 2022 email.

EXHIBIT # 5 EBay phone Transcript page 19 1972 oil painting sale was an UNDEFINED

EXHIBIT # 6 Nov. 23, 2022 Conference Call to include pages 4 thru 21

EXHIBIT #7 WP000130 stating March 5, 2013 was the date the 1972 post

EXHIBIT #8 Rosen vs Terapeak, infringing items WorthPoint's on March, 5,2013"

EXHIBIT #9 A WP000120 Temporal Google Removal on March 3, 2016

EXHIBIT #10 B WP000134 Google Remoal on Jan. 4, 2017

EXHIBIT #11 A-April 8, 2022 request the DMCA agent's name

B Email to Copyright Office May 2022

C WorthPoint Copyright Registration DMCA Agent

D Returned Mail from Gregory Watkins

EXHIBIT #12 A Georgia Lawsuit Process Server False Affidavit —Never asked in Military

B Summons and Complaint with wrong dates and claims

C Motion for Default Judgement filed Oct. 31, 2022

D Proposed Order with Future Dates August 30, 2023 and Sept 29, 2023

E Affidavit by Annamarie Trombetta

F Affidavit by Phone Call Participant Wanda Buncamper

EXHIBIT #13 A Withdrawn Expert Witness Peter Trippi Sept. 22, 2022 Florida Address

#13 B Subpoena Sent to New York Home Peter Trippi Oct.7, 2022

EXHIBIT #14 Plaintiff Print and Script 1972 Signature with Girl Scouts Sash and Badge

EXHIBIT #12

LAW SUIT IN GEORGIA

Exhibit #1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANNAMARIE TROMBETTA

Plaintiff,
-against-

Civil Case No. 18-cv-00993-RA-SLC

NORB NOVOCIN, MARINE NOVOCIN, ESTATE
AUCTIONS, INC., AND WORTHPOINT CORPORATION,

Defendants.

**NOTICE OF DEPOSITION OF
PLAINTIFF ANNAMARIE TROMBETTA**

PLEASE TAKE NOTICE that, Pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant WorthPoint Corporation (hereinafter "WorthPoint") by and through its attorneys, WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, will take the deposition upon oral examination of Plaintiff Annamarie Trombetta, on the 30th day of August, 2022 at 9:00 a.m., at the law offices of WILSON ELSE MOSKOWITZ EDELMAN & DICKER, LLP, located at 150 East 42nd Street, New York, New York 10017.

The deposition will be conducted before an officer authorized by law to administer oaths for the purposes set forth in the Federal Rules of Civil Procedure and will be videotaped. If this deposition is not completed on said date, the taking thereof will continue from day to day thereafter, at the same time and via the same virtual means, weekends and holiday excluded.

Plaintiff is hereby advised that WorthPoint will be inquiring into the matters the matters listed in Exhibit A hereto.

EXHIBIT #12 A

LAW SUIT IN GEORGIA

Fulton County Superior Court

EFILEDRM

Date: 9/1/2022 5:22 PM

Cathelene Robinson, Clerk

Form 1 - AFFIDAVIT OF SERVICE



P7219694

WILSON, ELSEY, MOSKOWITZ, CHITRA BHADRASAIN
IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA

WORTHPOINT CORP., ET AL.,

PLAINTIFF

- vs -

ANNAMARIE TROMBETTA

DEFENDANT

Index No.
2022CV366175
Date Filed
Office No. N/A
Court Date.

STATE OF NEW YORK, COUNTY OF NEW YORK :SS:

FREDDI SIMON being duly sworn, deposes and says; I am over 18 years of age, not a party to this action, and reside in the State of New York.

That on the 30TH day of AUGUST, 2022 7:45 PM at
150 E 42ND STREET
NEW YORK NY 10017

I served the SUMMONS, COMPLAINT FOR DAMAGES
upon ANNAMARIE TROMBETTA
the DEFENDANT therein named by delivering and leaving a true copy or copies of the
aforementioned documents with ANNAMARIE TROMBETTA
said DEFENDANT personally.

Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of the service as follows:

SEX: FEMALE COLOR: WHITE HAIR: BROWN

APP.AGE: 55-65 APP. HT: 5'8 APP. WT: 135

OTHER IDENTIFYING FEATURES

That at the time of service, as aforesaid, I asked the DEFENDANT whether he/she was in the military service of the United States Government, or of the State of New York, and received a negative reply. Recipient wore ordinary civilian clothes and no military uniform. Upon information and belief based upon the conversation and observation as aforesaid I aver that the DEFENDANT is not in the military service, and is not dependent on anyone in the military service of the United States Government or the State of New York, as that term is defined in statutes of the State of New York, or of the Federal Soldiers and Sailors Civilian Relief Act.

187 Sworn to before me this
31ST day of AUGUST, 2022

SELENA INES ADAMES
Notary Public, State of New York
No. 01AD6365042
Qualified in QUEENS COUNTY
Commission Expires 09/25/2025

58
FREDDI SIMON 2066183
Lexitas
1235 BROADWAY 2ND FLOOR
NEW YORK, NY 10001
Reference No: 7-WEMED-7219694

2a

EXHIBIT #12 B

LAW SUIT IN GEORGIA

Motion To Dismiss EXHIBIT C

Fulton County Superior Court
 EFILEDLW
 Date: 6/14/2022 4:01 PM
 Cathelene Robinson, Clerk

IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA
 136 PRYOR STREET, ROOM C-103, ATLANTA, GEORGIA 30303

SUMMONS

WORTHPOINT CORP., SHARI SEIPPEL,

AND WILLIAM SEIPPEL

Plaintiff,

vs.

ANNAMARIE TROMBETTA

Defendant

Case No. 2022CV366175

No.:

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file electronically with the Clerk of said Court at <https://efilega.tylerhost.net/ofswweb> (unless you are exempt from filing electronically) and serve upon plaintiff's attorney, whose name and address is:

Mary Trachian-Bradley (mtrachian@briskinlaw.com)
 BRISKIN, CROSS & SANFORD, LLC
 33 S. Main Street, Suite 300, Alpharetta, GA 30009

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

6/14/2022

This day of , 20

Honorable Cathelene "Tina" Robinson
 Clerk of Superior Court

By *[Signature]*
 Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you , 20

Deputy Sherriff

Instructions: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum is used

No Date or Signature Empty

Fulton County Superior Court
FILEDLW

Motion to Dismiss

EXHIBIT

10.

Trombetta was directed to file her purported Amended Complaint by January 17, 2020. On that date Trombetta filed a pleading entitled "Proposed Amended Complaint."

11.

Trombetta then untimely filed a pleading entitled the "Operative Amended Complaint" on February 21, 2020.

12.

Trombetta's Amended Complaint alleged claims against WorthPoint, worthpoint.com, WSeippel, and Jason Packer, a WorthPoint employee.

13.

On March 19, 2020, Trombetta was ordered to effect service of the Amended Complaint on WorthPoint and WSeippel. Ms. Trombetta failed to properly effect service.

14.

On April 6, 2020, Trombetta was again ordered to effect service of the Amended Complaint on WorthPoint and WSeippel no later than May 21, 2020. Ms. Trombetta failed to properly effect service.

15.

Approximately one (1) full year after filing the Amended Complaint, Trombetta arranged service of process on WorthPoint and WSeippel. On Jan 1, 2020, service was delivered via certified mail to WorthPoint. On January 4, 2020, service was delivered via Certified Mail to WSeippel and SSeippel's home residence.

Wrong Year
Wrong Year

ALERT: USPS IS EXPERIENCING UNPRECEDENTED VOLUME INCREASES AND LIMITED EMPL...

USPS Tracking®

FAQs >

Exhibit # G Page 1

Track Another Package +

Tracking Number: 70190160000091348478

Remove X

Your item was delivered to an individual at the address at 1:54 pm on January 11, 2021 in ROSWELL, GA 30075.

✓ DeliveredJanuary 11, 2021 at 1:54 pm
Delivered, Left with Individual
ROSWELL, GA 30075

Get Updates ✓

Text & Email Updates

Tracking History

January 11, 2021, 1:54 pm

Delivered, Left with Individual

ROSWELL, GA 30075

Your item was delivered to an individual at the address at 1:54 pm on January 11, 2021 in ROSWELL, GA 30075.

January 11, 2021, 6:10 am

Out for Delivery

ROSWELL, GA 30075

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

ROSWELL, GA 30075

OFFICIAL USE

Certified Mail Fee	\$3.55
Extra Services & Fees (check box, add fee as applicable)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$2.80
Total Postage and Fees	\$9.20

Postmark Here
01/04/2021

Sent to
William K. Seippel Sharon A. Seippel
Street and Apt. No., or PO Box No.
190 Pinhead Terrace
City, State, ZIP+4®
Roswell, Georgia, 30075

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Feedback

Marked on Jan 4, 2021

EXHIBIT #12 C

LAW SUIT IN GEORGIA

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

WORTHPOINT CORP., SHARI
SEIPPEL, AND WILLIAM SEIPPEL,

PLAINTIFFS,

V.

ANNAMARIE TROMBETTA,

DEFENDANT.

Civil Action

File Number: 2022 CV 366175

**PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT
IN RESPONSE TO DEFENDANT'S MOTION TO DISMISS**

COME NOW Plaintiffs WORTHPOINT CORP., SHARI SEIPPEL and WILLIAM SEIPPEL (hereinafter collectively referred to as "Plaintiffs") and move pursuant to O.C.G.A § 9-11-55, for judgment on all counts of Plaintiffs' ("Complaint") against Defendant ANNAMARIE TROMBETTA, and show this Court the following:

1.

Plaintiffs caused Defendant to be served personally with a true and correct copy of the Summons and Complaint, which service was perfected by a private process server on August 30, 2022, as reflected in the *Affidavit for Entry of Service* filed on September 1, 2022.

2.

Service was properly effectuated as set forth in the two (2) Affidavits of Service filed with this Court.

3.

Defendant acknowledged receipt of the Summons and Complaint on August 30, 2022.

4.

More than thirty (30) days elapsed prior to Defendant sending an electronic copy of a responsive pleading. The electronic copy was (1) untimely and (2) did not effectuate proper filing within the State of Georgia.

5.

More than thirty (30) days elapsed prior to Defendant filing her first responsive pleading on November 5, 2022

6.

At the time that Defendant filed her response on November 5, 2022, Defendant was in default.

7.

No costs have been paid by Defendant, and said default has not been opened as a matter of right in the manner set forth in O.C.G.A § 9-11-55.

8.

By virtue of Defendant's failure to open her default, Defendant has admitted all well-pleaded allegations contained in the Complaint, as well as all reasonable inferences that could be drawn from such allegations. Stroud v. Elias, 247 Ga. 191, 193 (1981).

9.

The facts alleged in the Complaint show that Defendant is liable to Plaintiffs for claims for abusive litigation and emotional distress.

10.

The torts committed by Defendant were knowingly committed by Defendant within Fulton County, Georgia.

EXHIBIT #12 D

LAW SUIT IN GEORGIA

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

**WORTHPOINT CORP., SHARI
SEIPPEL, AND WILLIAM SEIPPEL,**

PLAINTIFFS,

V.

ANNAMARIE TROMBETTA,

DEFENDANT.

Civil Action

File Number: 2022 CV 366175

ORDER GRANTING DEFAULT JUDGMENT

Defendant Annamarie Trombetta ("Defendant"), having been duly and lawfully served with the *Summons and Complaint* in this action on August 30, 2023 as established by Affidavit, having failed to respond thereto as required by law, this action having automatically being in default on September 29, 2023, and Defendant having failed to move the Court to open the default or pay the mandatory costs as a matter of right within 15 days of the day of default,

IT IS HEREBY ORDERED AND ADJUDGED:

1. Plaintiffs' Motion for Default is hereby granted, the Court hereby finds for Plaintiffs and against Defendant as to liability on each Count of the Complaint, and further finds that Plaintiffs shall have the following relief:

- i. Judgment to WorthPoint Corp. in the liquidated sum of \$85,000.00 itemized in paragraphs 27 and 28 of Plaintiff's Complaint for the calculation of (1) attorneys' fees, (2) termination and replacement of business insurance coverage, and (3) salaries paid for employees in investigation of the claims raised,

Future
Dates

EXHIBIT #12 E

LAW SUIT IN GEORGIA

Call details

Exhibit #2

+1917

New York

Phone Call
made by

Annamarie Lombardi
ON

7:40 PM, Tue, Aug 30, 2022

Message

Call

Options

AFFIDAVIT OF ANNAMARIE TROMBETTA

STATE OF NEW YORK :

COUNTY OF NEW YORK :

Annamarie Trombetta, being duly sworn deposes and states :

1. I am currently pursuing a federal lawsuit in The Southern District Court of New York as Plaintiff against Estate Auctions Inc. owned by Norb and Marie Novocin and WorthPoint Corporation (2018 CV 00993)) for Direct Copyright Infringement; violations of the Digital Millennium Copyright Act (false Copyright Management Information) ; violation to the Visual Artist's Rights Act, false attribution and use of the name Annamarie Trombetta. The subject matter of the law suit is an oil painting bearing my name. I would have been nine years of age and did not paint as advertised by WorthPoint Corp., an oil painting misattributed to my name which used my self authored biography.
2. I am an artist and specifically I am a fine arts painter residing in New York City, known for my realist style of painting. The allegations in the above lawsuit and at the heart of my law suit relate to a painting bearing at the front of the painting, the signature: "A. Trombetta". That the painting bears that signature is an unchallenged fact. The back of the painting, bears the name "Anna Maria Trombetta" but that fact is currently disputed. The painting is not painted by me, nor was the painting signed by me and there is no other artist with the name A. Trombetta or Annamarie Trombetta in New York city or elsewhere. I found the false internet posting under my name on Google in 2015.
3. WorthPoint Corporation, one of the defendants in the above-identified law suit , is owned and operated by the individuals, Shari Seippel and Will Seippel. Will Seippel is the CEO and founder of WorthPoint Corporation. Shari Seippel and Will Seippel filed a summons and complaint on June 14, 2022 in the Fulton County Superior Court naming me as the defendant and asking for damages related to the litigation in New York. Their law suit alleges abusive litigation and infliction of emotional harm.
4. On Tuesday, August 30, 2022, on or around 9 :00 a.m. I, was scheduled to be deposed as a party

witness in a deposition called for by defendant WorthPoint Corporation and conducted by the attorneys at Wilson, Elser, and Moskowitz, the law firm representing WorthPoint Corporation in the above identified litigation. The deposition took place at Wilson, Elser offices, located at 150 East 42nd street in New York, New York 10017. The deposition was nine hours long. See attached hereto **EXHIBIT #1 August 30, 2022 Deposition Notice from Wilson Elser offices.**

5. The deposition started at 9:30 am. Present were: WorthPoint Corporation's attorney Adam Bialek and Jana Farmer from Wilson Elser in New York and Robert Schmitt, corporate attorney for WorthPoint, from Atlanta Georgia, and Anderson Duff, attorney for Estate Auctions Inc. When the deposition ended approximately at 7:30 pm, I refreshed myself and then proceeded to the lobby of the building to make some phone calls. At approximately 7:40 pm I made a cell phone call to a friend. At that point, I was still in the lobby of Wilson Elser's offices. See attached hereto **EXHIBIT #2 Defendant's August 30, 2022 Phone Call at 7:40 p.m. to another party.**

6. Prior to leaving the lobby at Wilson, Elser, Moskowitz at 150 East 42nd street New York, I reached into my satchel strapped across my shoulder, unzipping the front compartment to obtain my transit metro card. At that time I was about to leave the lobby and began to walk outdoors. While speaking on the phone, I walked outside along Third avenue and 42nd street to proceed home. I had one hand on my cell phone while speaking and had my metro card in the other hand.

7. As I reached the corner of 42nd street, the traffic light turned red which prohibited me and a mass of people from crossing the street. While still speaking on the cell phone with one hand and holding my metro card in the other, I suddenly felt someone tugging at my satchel that was strapped across my shoulder. That sudden movement startled me and I became immediately frightened of being the victim of a pickpocket. I turned around and saw no one in the crowd yet saw pages of papers on the pavement. My thought was these came from the opened compartment of my satchel and picked them up, believing they were papers I had prepared from my nine hour deposition and stuffed them back into the unzipped compartment of my satchel. I was quite shaken by this encounter.

8. Moments later I inspected the papers and realized they were not from my satchel. Someone had dropped these papers near me on the sidewalk or even tried to put them on or in my satchel and the papers fell to the ground. This was perhaps a way to get me to pick up these papers.
9. Upon full inspection at home, I saw that the papers were a complaint of a law suit filed against me in Georgia by WorthPoint Corporation, the party in my New York federal copyright litigation. In addition, it named the owners of WorthPoint Corporation, Will and Shari Seippel whom I have never spoken to or met at any time. I did not see a date of entry or a signature on the bottom of the summons yet know that the absence of a date of entry for service is crucial to the timed response.
10. I waited two week to see if a mailing of the summons and complaint from Plaintiffs, Will and Shari Seippel or WorthPoint Corporation would arrive at my home address at 175 East 96th Street (12 R) New York, New York. To date, I heard nothing from anyone in Georgia nor did I receive any mail by regular or certified mail that would be a copy of the summons and complaint from Will and Shari Seippel or WorthPoint Corporation.
11. Concerned of what would happen if the Georgia legal matter would proceed in this matter in which I believed I was completely improperly served, I contacted the Fulton County Superior Court in order to find out if an entry of an affidavit of service was ever filed. One source in particular called me back. Upon hearing that I was improperly served as a courtesy the employee in the civil rights unit at the Fulton County Superior Court, Mr. E Brian Watkins, emailed me the Affidavit of Service Index No, 2022CV 366175. See attached here to **EXHIBIT # 3 Affidavit of Service of summons and complaint dated August 31 2022.**
12. When I perused the Affidavit of Service, I read what the process server had documented on Tuesday August 30, 2022 at 7:45. The process server stated: *"I asked the DEFENDANT whether he/she was in the military service of the United States Government, or of the State of New York. and received a negative reply"*. I was shocked to read that, because of course at no time had anybody ever spoken to me on August 30, 2022 at 7:45 or before or any time after. The process server also wrote: *" Upon information and belief based upon the conversation and*

EXHIBIT #12 F

LAW SUIT IN GEORGIA

IN THE SUPERIOR COURT OF Fulton COUNTY
Willard Sharp Seippel and
Worth Point Corporation
Plaintiff,

v. Annamarie Trombetta
Defendant

Civil Action File No. 2022CV366175

AFFIDAVIT

STATE OF GEORGIA
COUNTY OF Fulton

Personally appeared before the undersigned officer authorized to administer oaths,
Wanda Buncamper, who states under oath that s/he has personal
knowledge of the following facts:

On August 30, 2022, Defendant
Annamarie Trombetta and I were talking by cell phone
Annamarie Trombetta was walking on the
street while speaking to me. Annamarie Trombetta
was properly served a summons
and complaint while I was talking with her. The summons
and complaint was on the street at no
time did I hear any person ask any questions
to her as stated by the process server. AT NO
TIME was Annamarie Trombetta asked if she was
in the military during our phone call. See attached

This 10 day of JULY, 20 23 Typed Affidavit

Affiant

Notary Public



Sworn to and subscribed before me
this 10 day of JULY, 20 23

IN THE SUPERIOR COURT OF FULTON COUNTY, IN THE STATE OF GEORGIA

WORTHPOINT CORPORATION,

SHARI SEIPPEL , WILLIAM SEIPPEL, PLAINTIFF

File No. 2022 CV 366175

VS ANNAMARIE TROMBETTA, DEFENDANT

AFFIDAVIT OF WANDA BUNCAMPER

STATE OF NEW YORK : COUNTY OF NEW YORK :

I, Wanda Buncamper, being duly sworn deposes and states :

1. My name is Wanda Buncamper, I am a resident in the State of New York and a neighbor of Annamarie Trombetta who is an award winning artist, and quite talented.
2. I am writing an affidavit on behalf of artist Annamarie Trombetta in support of the traumatic and abrupt manner in which she was improperly served a summons and complaint on August 30, 2022, while I was speaking to Ms. Trombetta on the phone on said date.
3. I am familiar with the details of an online false post listed under her name. I find the claim that a nine year old child painted a four foot high painting to be ridiculous and harmful to the artist's name and reputation. It caused her to lose so much time, unnecessarily.
4. Ms. Trombetta's lawsuit in New York is primarily seeking damages and legal constraints against, WorthPoint, that intentionally lied to her and directed Ms. Trombetta to contact eBay to remove the fake online posting, while WorthPoint knowingly listed the false 1972 post on their website. I know about this case as I often meet Ms. Trombetta in the business center of our building where we both reside. Annamarie uses the printer/scanner for all legal matters.
5. On August 30, 2022, Ms Trombetta had to go for a deposition, for her lawsuit in New York, hired by WorthPoint, a company that repeatedly posted on their online website a false claim misusing her name and biography for a painting she did not paint. I support Annamarie's effort to protect her identity against those who displayed a signature that was not by her hand.

6. On Tuesday, August 30, 2022 on or around 7 : 40 PM, Annamarie Trombetta phoned me while still in the lobby where she was deposed. I remember her describing a large, old style carriage on display in the lobby of the law firm where she was deposed on 42nd street.

7. As I was speaking to her I could tell she was no longer inside. I could hear the street noise and horns and she was speaking louder into the phone.

8. I can affirm, I suddenly heard her shout " Ah" as if something happened. When I asked her "what's wrong ?", Annamarie said" someone just tried to grab my shoulder bag from behind."

9. I asked her again " *What happening*" ? I can attest she was startled and traumatized. She was speaking in incomplete sentences. I encouraged her to go home. I kept talking to her while she commuted by train.

10. We met when Annamarie returned home, I saw the legal papers. I asked Annamarie if she saw the person who improperly served the papers. She replied "*No I don't know if it was a male or female. Someone grabbed my bag ..I turned around... and saw papers on the floor*" She repeated the same description as stated during our phone call.

11. There was no date on the summons and complaint. Annamarie showed me statements with the wrong dates on the same page. all with the year 2020, despite events happening one year later, in 2021. These self evident inexcusable incorrect dates, reveal a lack of legal professionalism.

12. I have read the affidavit by the process server, Freddie Simon. I am attesting that I was speaking with Annamarie Trombetta from the time she was inside the law firm's lobby till the time she entered the subway. No one ever spoke or asked Ms. Trombetta if she was in the military at any time as the process server ,Freddie Simons' affidavit states. During our phone conversation, we were in constant dialogue. The servers affidavit has false statements.

13. I have read three legal documents by attorney Mary Trachain-Bradley dated June 14, 2020, October 31, 2022 and the June 29, 2023 Each filing has incorrect dates.

1- The first filing has mistakes is on page 3 regarding the date of service. She wrote the date of the receipt of mailing Jan.1, 2020, which is New Year's day. The year should be 2021.

2- The Attorney 's date of filing her default judgement is Oc. 31, 2022. Her document claims Ms.Trombetta's response was filed Nov. 5, 2022, a date after Oct. 31 2022.

3- The dates on the attorney's proposed order for the summons and complaint are in the future in August and Sept. 2023 Her claims are not verifiable. All three legal documents filed by attorney Mary Trachain-Bradley have clerical errors and an inexcusable pattern of neglect. It behoves me to see such mistakes on a legal document.

14. Annamarie Trombetta is a talented, kind person who would not intentionally inflict emotional distress on anyone. Any claims that she would cause harm unnecessarily are false. These people should really leave Ms. Trombetta alone and let her paint . She does not deserve to be treated with such disrespect and burdened by such false claims and problems


15. I affirm, the process server never spoke with Annamarie Trombetta on August 30, 2022.

I affirm was on the phone with Annamarie Trombetta on or around 7:40 PM on said date until she entered the subway around 8 pm. The process server never asked Ms. Trombetta any questions or if she was in the military Ms. Trombetta was improperly served a summons and complaint. She waited to receive the summons and complaint in the mail and never did.

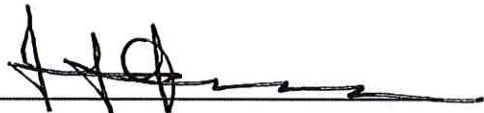
WHEREFORE, I can attest as a witness to the party Annamarie Trombetta, who was improperly served and never spoken to at any time on August 30, 2022.

Dated: 07-03, 2023

Sworn to before me this 03 day of JULY, 2023



Wanda Buncamper



Notary

HOSSAIN MOHAMMED N
NOTARY PUBLIC, STATE OF NEW YORK
01HO6356839
QUALIFIED IN QUEENS COUNTY
COMMISSION EXPIRES APRIL 10, 2025

Wanda Buncamper
175 East 96th Street
New York, New York, 10128